

Elizabeth J. Cabraser (State Bar No. 083151)  
Roger N. Heller (State Bar No. 215348)  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: (415) 956-1000  
ecabraser@lchb.com  
rheller@lchb.com

Jason L. Lichtman (*pro hac vice* forthcoming)  
Danna Z. Elmasry (*pro hac vice* forthcoming)  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
250 Hudson Street, 8th Floor  
New York, New York 10013-1413  
Telephone: (212) 355-9500  
jlichtman@lchb.com  
delmasry@lchb.com

*Attorneys for Plaintiff and the Proposed Class*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

JOSE MORAN, *individually and on behalf*  
*of others similarly situated,*

Plaintiff,

v.

PAYPAL INC. and PAYPAL  
HOLDINGS, INC.,

Defendant.

Case No. 5:25-cv-476

**PLAINTIFF'S NOTICE OF PENDENCY**  
**OF RELATED ACTIONS**

Pursuant to Civil Local Rule 3-13, Plaintiff Jose Moran, individually and on behalf of all others similarly situated, respectfully advises the Court of the following Related Actions:

1. *Wendover Productions, LLC et al v. PayPal Inc.*, No. 5:24-cv-09470 (the “Wendover Action”), pending before Judge Freeman;
2. *Silva et al. v. PayPal Holdings, Inc. et al.*, No. 5:24-cv-09510, pending before Judge van Keulen;
3. *GamersNexus LLC v. PayPal Holdings, Inc. et al.*, No. 5:25-cv-00114, pending before Judge Freeman;
4. *Young v. Paypal, Inc. et al.*, No. 5:25-cv-124, pending before Judge Lee; and
5. *Coleman v. PayPal Holdings, Inc. et al.*, No. 5:25-cv-00367, pending before Judge Cousins (collectively, the “Related Actions”).

This action overlaps significantly with the newly-filed Related Actions.<sup>1</sup> First, this action and the Related Actions name overlapping defendants—PayPal Inc. and PayPal Holdings, Inc (“PayPal”). Second, this action and the Related Actions make substantially similar factual allegations. Specifically, they allege that PayPal diverted commissions due to Plaintiffs and class members via the use of its Honey web browser extension. Third, this action and the Related Actions involve overlapping class definitions. And finally, this action and the Related Actions bring overlapping claims for tortious interference, conversion, and unjust enrichment. As a result, the adjudication of this action will require resolving the same or substantially similar questions of law and fact as those posed by the Related Actions. Therefore, coordination with the Related Actions would avoid conflicts, conserve resources, and promote the efficient adjudication of this action.

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<sup>1</sup> Plaintiffs in one of the Related Actions have filed an unopposed administrative motion to consider whether cases should be related, pursuant to Civil Local Rule 3-12. *Wendover Prods.*, No. 5:24-cv-09470, ECF No. 11.

1 Dated: January 14, 2025

Respectfully submitted,

2 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

3  
4 By: /s/ Roger N. Heller

5 Roger N. Heller

6 Elizabeth J. Cabraser (State Bar No. 083151)

7 Roger N. Heller (State Bar No. 215348)

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9 BERNSTEIN, LLP

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20 New York, New York 10013-1413

21 Telephone: (212) 355-9500

22 jlichtman@lchb.com

23 delmasry@lchb.com

24 *Attorneys for Plaintiff and the Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 14, 2025, I caused the foregoing to be electronically filed and served with the Clerk of the Court using the CM/ECF system to all parties of record.

/s/ Roger N. Heller  
Roger N. Heller

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